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FILE NUMBER

DIRECT DIAL (202) 789-3447

March 5, 1993

BY HAND

Dale E. Bickel, Supervisory Electronics Engineer  
FM Branch  
Mass Media Bureau  
Federal Communications Commission  
Room 332  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Application of Santa Monica Community College District  
For New FM Station, Mojave, California  
File No. BPED-920305ME

Dear Dale:

This is a response to your letter of December 18, 1992 to Santa Monica Community College District ("Santa Monica") concerning the above-referenced application and to Living Way Ministries concerning their application for a new FM station in Lancaster, California (File No. BPED-920511MC). This letter also is a response to our telephone conversation concerning certain technical aspects of Santa Monica's application.

First, the parties are unable to resolve the conflict between their applications. Consequently, it would be appreciated if the FM Branch could move forward to designate the applications for hearing at the earliest date practicable.

Second, Santa Monica had prepared an environmental statement concerning protection against RF radiation prior to the submission of its application, and Santa Monica had been under the mistaken impression that the environmental statement had been filed subsequently as an amendment. In any event, enclosed is another original of that environmental statement.

Finally, this will acknowledge your assessment of John Davis' letter to you of March 28, 1992 concerning his view that FAA notification is not necessary for the Santa Monica tower. You have explained that the FCC requires FAA notification if the

MJD  
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Dale E. Bickel, Supervisory Electronics Engineer

March 5, 1993

Page 2

tower is located within five (5) miles of an airport. Since Santa Monica's proposed tower is located within 5.128 kilometers of the Tehachapi Mountain Valley Airport, FAA notification is, in the FCC's view, required. Therefore, further amendment will be necessary to reflect notification to the FAA. If the amendment is not received prior to the issuance of a hearing designation order, an appropriate issue will be added (with an opportunity to amend at that time).

If my understanding is incorrect in any way, please let me know at your earliest convenience. In the meantime, I want to thank you for your time and cooperation.

Sincerely,

KECK, MAHIN & CATE

Attorneys for  
Santa Monica Community College  
District

By: 

Lewis J. Paper

cc: Gary C. Curtis  
Will Lewis  
John J. Davis, P.E.

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ENVIRONMENTAL STATEMENT

PROCEDURE TO PROTECT WORKERS FROM  
EXCESSIVE LEVELS OF RF RADIATION

ADDENDUM TO THE  
APPLICATION FOR CONSTRUCTION PERMIT  
FOR A NEW NCE-FM STATION  
CHANNEL 204B, 88.7 MHz  
MOJAVE, CALIFORNIA

PREPARED FOR:

SANTA MONICA COMMUNITY COLLEGE DISTRICT  
1900 PICO BOULEVARD  
SANTA MONICA, CALIFORNIA 91405

AUGUST 15, 1991

PREPARED BY:

JOHN J. DAVIS  
CONSULTING ENGINEER  
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204B:910815A

## 1.0 INTRODUCTION

This Environmental Statement, an addendum to the Application for Construction Permit of Santa Monica Community College District ("Santa Monica") for a new non-commercial educational FM station ("NCE-FM") to serve Mojave, California, deals with Santa Monica's plan for limiting the risk of radio-frequency ("RF") radiation exposure to persons working on or near the transmitting antenna. The main Engineering Exhibit of the application addressed the issue of RF radiation with respect to levels likely to be experienced on the ground that might affect the general public. This Environmental Statement addresses the plan that Santa Monica will implement to reduce the RF radiation hazard for tower riggers and others working near the Santa Monica transmitting antenna.

In the Engineering Exhibit of Santa Monica's application, it is pointed out in Section 12.1, Human Exposure to RF Radiation, that the RF levels to be experienced on the ground will be considerably less than the maximum of  $1.0 \text{ mW/cm}^2$  as specified in OST Bulletin No. 65. The only way a worker could come near any levels that exceed these OST guidelines is to be either touching or very near the Santa Monica transmitting antenna.

Outlined here are the procedures that Santa Monica plans to incorporate into its transmitter operating procedures to limit the risk of RF radiation exposure.

## 2.0 OCCUPATIONAL RADIATION HAZARD PLAN

Santa Monica will establish the following procedures to reduce the exposure to excessive levels of RF radiation for those who will be working in the vicinity of Santa Monica's transmitting antenna.

1. Post an approved "RF Radiation Hazard" sign at the base of the antenna mounting pole.
2. Require workers performing work for, and at the direction of Santa Monica, while working near the transmitting antenna to wear an approved radiation suit, or
3. Have the work done at times of the day when the station can be shut down, or
4. Reduce the transmitter output to a level where a person can work safely in the vicinity of the antenna.

## 3.0 SUMMARY

Santa Monica has outlined a set of procedures that it will implement to reduce the risk that any worker will come into excessive levels of RF radiation while working near the transmitting antenna.

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RADIATION HAZARD PROCEDURES  
NEW NCE-FM STATION  
CHANNEL 204B, 88.7 MHz  
MOJAVE, CALIFORNIA

PREPARED FOR:

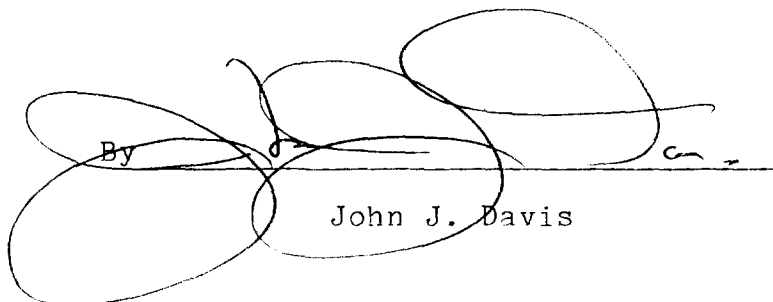
SANTA MONICA COMMUNITY COLLEGE DISTRICT  
SANTA MONICA, CALIFORNIA

4.0

AFFIDAVIT

STATE OF CALIFORNIA    )  
                              )  
COUNTY OF LOS ANGELES)           ss:

JOHN J. DAVIS, does hereby swear that he is a consulting electronics engineer with offices in Sierra Madre, California; that he is a Registered Professional Engineer in the State of California; that his qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission; that the foregoing engineering statement was prepared by him or under his direction; and that the statements contained therein are true of his own knowledge and belief, and as to those statements, he verily believes them to be true and correct.

By  John J. Davis

August 15, 1991